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Subject
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time-Critical Removal Action – Former Plainwell Impoundment
Monthly Report (September 2007)

INDUSTRIAL

Date
October 15, 2007

Contact
Steve Garbaciak

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312.332.4937 ext 12

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steve garbaciak@
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Our ref
B0064530.014

Dear Sam.

Attached is the seventh monthly progress report for the Allied Paper, Inc /Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action. This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS of New York, Inc.

Stephen Garbaciak Jr., P.E
Principal Engineer/Vice President

Copies
Paul T. Bucholtz, MDEQ
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407026

MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/ KALAMAZOO RIVER SUPERFUND SITE TIME-CRITICAL REMOVAL ACTION (TCRA) – FORMER PLAINWELL IMPOUNDMENT

REPORT #7, SEPTEMBER 2007

PREPARED BY ARCADIS BBL
OCTOBER 15, 2007

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP

SUBMITTED TO

SAMUEL BORRIES, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Monthly Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site TCRA

REPORT #7, SEPTEMBER 2007

Significant Developments and Activities During the Period

- On September 4, the Kalamazoo River Study Group (KRSG) submitted a copy of the *17th Weekly Construction Report for the Plainwell TCRA* to the United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ).

- On September 5, the USEPA transmitted comments on the *Multi-Area Field Sampling Plan* (FSP) to the KRSG via facsimile (a hard copy was received on September 11).

- On September 6, the KRSG submitted a Subcontractor Qualification Notification for Schrader Environmental Services, Inc. to USEPA, as required by Paragraph 11 of the TCRA Administrative Settlement Agreement and Order on Consent (AOC)

- On September 11, the KRSG submitted a copy of the *18th Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

- On September 11, the KRSG submitted an electronic copy of the approval signature page for the *Multi-Area Quality Assurance Project Plan* (QAPP) to the USEPA for signature.

- On September 14, the KRSG submitted a copy of the agenda for the upcoming Stakeholders Meeting to USEPA, MDEQ and the Michigan Department of Natural Resources (MDNR).

- On September 17, the KRSG submitted the sixth *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for August 2007 to USEPA

- On September 18, the KRSG submitted a copy of the *19th Weekly Construction Report for the Plainwell TCRA* to USEPA and MDEQ.

- On September 19, a Stakeholders Meeting was held onsite between USEPA, MDEQ, MDNR and KRSG.

- On September 21, the KRSG submitted a hard copy of the response to the USEPA's comments on the *Multi-Area FSP* to the USEPA.

- On September 24, the USEPA submitted a letter via facsimile (a hard copy was received on September 27) to the KRSG approving the *Multi-Area FSP*.

- On September 25, the KRSG submitted an electronic copy of the response to the USEPA's comments on the *Multi-Area FSP* to the USEPA.

- On September 4, September 10 and September 17, the KRSG submitted copies of analytical data from TCRA sampling activities to USEPA.

- By September 30, the KRSG had obtained property access agreements, as required by Paragraph 23 of the TCRA AOC (Table A), from nine property owners. One property owner (Consumers Energy) provided verbal permission to collect pre-construction samples while the access agreement is finalized (scheduled for the week of October 1).

Data Collected and Field Activities Conducted During the Period

- During the week of September 4, the KRSG developed access to Island 2; completed excavation of sediment from Island 2; completed excavation of TSCA material from Removal Area 3B; completed final grading and topsoil placement at Removal Areas 2B, 3B and 4B; and completed seeding and placement of erosion control mats on the north bank of the river (Removal Areas 1 through 6A). Four sediment confirmation samples (K55302 through K55305) were collected from Removal Areas 5 and 3B for polychlorinated biphenyls (PCB) analysis. A duplicate of sample K55303 (K55306) was also collected and USEPA collected a split sample of confirmation sample K55305 (APS-090607-06-SD/K55305) Two surface water samples (K30649 and K30650) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 3B for PCB analysis. A rinse blank (K30651) was also collected Soil samples K25729 through K25734 were collected from the access roads located around Staging Area 1N. These samples were collected from the exact same locations as samples K25700 through K25705 (collected in May 2007) to show that the PCB concentration in the soil in these areas had not increased during TCRA activities. Prior to discharge, wastewater samples W_SA1N_Influ_0009, W_SA1N_MidA_0009 and W_SA1N_Efflu_0009 were collected from the influent port, the midpoint port on the right side of the treatment system and the effluent port on the right side of the water treatment system, respectively, located at Staging Area 1N. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) or Wayne Landfill in Belleview, Michigan for disposal.

- During the week of September 10, the KRSG developed access to Island 1; commenced excavation of sediment from Island 1; began construction of Staging Area 3S, started removal of Staging Areas 1N and 2S; and completed installation of the Phase 1 cofferdam. Two sediment confirmation samples (K55307 and K55308) were collected from Removal Area 3B for PCB analysis. Two surface water samples (K30652 and K30653) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Island 2 for PCB analysis A rinse blank (K30654) was also collected. Prior to discharge, wastewater samples W_SA1N_Influ_0010 and W_SA1N_Influ_0011 (influent port), W_SA1N_MidA_00010 and W_SA1N_MidA_0011 (midpoint port, right side), W_SA1N_MidB_0006 and W_SA1N_MidB_0007 (midpoint port, left side), W_SA1N_EffluA_0010 and W_SA1N_EffluA_0011 (effluent port, right side) and W_SA1N_EffluB_0006 and W_SA1N_EffluB_0007 (effluent port, left side) were collected from the water treatment system located at Staging Area 1N A duplicate of sample W_SA1N_EffluB_0006 (W_SA1N_Dup_0002) was also collected from the left effluent port. Table B summarizes the samples collected Solidified material from the staging areas was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) or Wayne Landfill in Belleview, Michigan for disposal.

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- During the week of September 17, the KRSG commenced excavation of material in Removal Area 6B; continued excavation of material from Island 1; continued post-excavation and revegetation work; finished removal of Staging Areas 1N and 2S; started construction on the staging area located near the Plainwell Dam; continued construction of Staging Area 3S; and began construction of the water control structure. Four sediment confirmation samples (K55309 through K55312) were collected from Removal Area 6B for PCB analysis The USEPA collected a split sample of confirmation sample K55311. Two surface water samples (K30655 and K30656) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 6B for PCB analysis. A rinse blank (K30657) was also collected. Soil sample K25735 was collected from Staging Area 1N upon removal of the staging area This sample was collected from the same location as sample K25706 (collected in May 2007) to show that the PCB concentration in the soil in this area had not increased during TCRA activities. Soil samples K25736 through K25738 were collected from the Consumers Energy parcel located near the Plainwell Dam to determine a background PCB concentration. Table B summarizes the samples collected. Solidified material from the staging areas was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

- During the week of September 24, the KRSG completed excavation of material in Removal Area 6B and Island 1, started construction on Staging Area 3S; completed installation of the 500 gallon per minute water treatment system near the water control structure; continued construction of the water control structure; and continued post-excavation and revegetation work upstream of U.S. 131 on the north side of the river and in Removal Area 6B. Four sediment confirmation samples (K55313 through K55316) were collected from Removal Area 6B for PCB analysis. The USEPA collected a split sample of confirmation sample K55314. Two surface water samples (K30658 and K30659) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 6B for PCB analysis. A rinse blank (K30660) was also collected. Table B summarizes the samples collected. No water was treated during this week, however, water treated during the week of September 10 that was not discharged at that time was discharged on September 28. No material was processed or transported offsite.

- As of September 30, a total of 16,520 cubic yards of material has been excavated from Removal Areas 1, 2A and 2B, 3A and 3B, 4A and 4B, 5, 6A and 6B, Upland Areas 3A1, 3A2 and 4A1, and Islands 1, 2, and 3.

Monthly Report for the Allied Paper, Inc./Portage Creek/ Kalamazoo River Superfund Site TCRA

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Laboratory Data Received During the Period

- During the week of September 3, the KRSG received laboratory data for confirmation samples K55302 through K55306 (including the USEPA split sample of K55305), surface water samples K30646 through K30648 (which were collected in August), soil sample K25728 (which was collected August), and waste water samples W_SA1N_Influ_0009, W_SA1N_MidA_0009 and W_SA1N_EffluA_0009 (Table B).

- During the week of September 10, the KRSG received laboratory data for confirmation samples K55307 and K55308, post-construction samples K25729 through K25734, and waste water samples W_SA1N_Influ_0010, W_SA1N_MidA_0010, W_SA1N_MidB_0006, W_SA1N_EffluA_0010, W_SA1N_EffluB_0006, W_SA1N_Influ_0011, W_SA1N_MidA_0011, W_SA1N_MidB_0007, W_SA1N_EffluA_0011, W_SA1N_EffluB_0007 and W_SA1N_Dup_0002.

- During the week of September 17, the KRSG received laboratory data for confirmation samples K55309 through K55312 (including the USEPA split sample of K55311), surface water samples K30649 through K30651 and post-construction sample K25735.

- During the week of September 24, the KRSG received laboratory data for confirmation samples K55313 through K55316 (including the USEPA split sample of K55314), surface water samples K30652 through K30654, and pre-construction soil samples K25736 through K25738.

- The KRSG is awaiting analytical results for surface water samples K30655 through K30660.

Issues Encountered and Actions Taken

- On September 6, USEPA split sample K55305 with the KRSG. The split sample was collected from Removal Area 3B, Grid 3B, a TSCA sediment area. Although the PCB concentration detected in the KRSG sample (2.6 mg/kg) was below the performance standard of 5 mg/kg, the PCB concentration detected in the USEPA sample (7.8 mg/kg) exceeded the performance standard. The KRSG determined that it was more time and cost effective to excavate additional material than to reanalyze the sample(s). On September 7, soft sediment deposits (3 to 6 inches in thickness) were removed from Removal Area 3B, Grid 3B until the native riverbed was encountered. Because the sand and gravel riverbed cannot be sampled, field personnel did not attempt to collect a confirmation sample. The USEPA on-scene coordinator was onsite during excavation activities and confirmed that excavation in the area was complete

- On September 10, USEPA and KRSG determined that TSCA and non-TSCA material located within the same confirmation sampling grid would be sampled separately. Non-TSCA material sampled from a grid is noted with an 'A' identifier and TSCA material is noted with a 'B' identifier, for example Removal Area 3B, Grids 1A (non-TSCA material) and 1B (TSCA material).

- On September 13, MDEQ collected three sediment samples from Removal Area 4B, Grid 9. During excavation activities, a sheen was observed on the water and a strong organic odor was detected in the sediment in this area. A total of six samples from the three locations were submitted for VOC, SVOC and/or PCB analysis. The status of any analytical results from those samples is not known to KRSG.

- On September 19, Scott Hanshue and John Lerg of MDNR reported that a resident had spotted dead fish near the Trowbridge Dam (downstream of the TCRA work area). Mr. Hanshue and Mr. Lerg did not indicate that construction activities being conducted on the river (including, but not limited to, TCRA work activities) were responsible for the dead fish, but asked if any spills or releases had been reported. Field personnel did not have any knowledge of any spills or releases. All personnel were removed from the river on September 19 and September 20 until the cause of the dead fish could be determined. On September 20, MDNR reported that the fish had died due to causes unrelated to the project's construction activities occurring on the river. On September 21, personnel resumed waterborne activities wearing the proper personal protective equipment.

- On September 21, a trespasser was seen near Staging Area 2S. KRSG field personnel informed the trespasser that this was a restricted area and directed him to the Kalamazoo River Website to answer any questions. The trespasser was cooperative and left the site without incident.

- During the week of September 24, numerous subsurface obstructions were encountered during initial installation of sheet pile as part of the construction of the water control structure To address this issue, the KRSG slightly modified the alignment of the water control structure, and sheet pile areas are now being pre-excavated to reduce the impact of obstructions on construction.

- On September 25 and September 26, MDEQ collected surface water samples while the turbidity curtain in Removal Area 1 was being removed. Samples were collected from the midpoint between the shore and the turbidity curtain and by moving a 1 liter amber jar vertically between the riverbed and water surface. A total of eight surface water samples, one duplicate sample and one background sample were collected. The status of any analytical results from those samples is not known to KRSG.

Developments Anticipated During the Next Reporting Period

- During the week of October 1, the KRSG is scheduled to complete installation of Staging Area 3S, continue post-excavation and revegetation work upstream of U.S. 131 on the south side of the river, continue installation of the water control structure and commence removal activities in Upland Area 6B1.

- During the week of October 8, the KRSG is scheduled to continue the installation of the water control structure, finish post-excavation and revegetation work upstream of U.S. 131, commence dewatering and soil excavation activities at the Phase 1 cofferdam area and the west channel and finish excavation of Upland Area 6B1.

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- During the week of October 15, the KRSG is scheduled to continue the installation of the water control structure, continue dewatering and soil excavation activities at the Phase 1 cofferdam area and the west channel, continue post-excavation and revegetation work and begin excavation activities in Removal Area 7.

- During the week of October 22, the KRSG is scheduled to hold a Stakeholders Meeting at the site, continue the installation of the water control structure, continue post-excavation and revegetation efforts, continue excavation of Removal Area 7 and continue dewatering and soil excavation activities at the Phase 1 cofferdam area and the west channel.

- During the week of October 29, the KRSG is scheduled to complete the installation of the water control structure, continue post-excavation and revegetation efforts and remove the soil and sediment from the west channel and embankment.

- Throughout October, the KRSG will continue to negotiate property access agreements as required by Paragraph 23 of the TCRA AOC (Table A).

- Throughout October, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to USEPA, as required by Paragraph 11 of the TCRA AOC.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #7, September 2007

Table A — Summary of Property Access Agreements (as of September 30, 2007)

Date Sent	Property Owner	Status
3/19/2007	A.C. Geenen Associates	no response
3/9/2007	Aggregate Industries (Bill Smith Sand and Gravel)	accepted
3/9/2007	Allen Robinson	accepted
3/9/2007	Balkema Excavating	accepted, amended 9/26
3/9/2007	Brad Keeler	accepted
3/9/2007	City of Plainwell	accepted
3/26/2007	Consumers Energy	in negotiations - verbal approval given to collect soil samples
3/9/2007	Meijer, Inc.	accepted
3/21/2007	Plainwell Group LLC	no response
3/16/2007	Robert Foster Trust	rejected
3/9/2007	Robert Keeler Trust	accepted
3/9/2007	Rolfe Family Trust	accepted
3/16/2007	Shirley Foster	no response
3/9/2007	Steven Peterson	accepted

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Table B — Summary of Samples Collected and Data Received in September 2007

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	PCB Action Limit (mg/kg)	Response Action
Soil Samples									
K25728	08/30/07	9/4/07 and 9/5/07	073647 / TCRA06	KAR Labs and TAL	Backfill collected from fill pile on Balkema property	TPH, total PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, TCL pesticides, organic content, pH, grain size, and gradation	< 0 33	4	None, no constituents exceeded action limits
K25729	09/07/07	09/10/07	073752	KAR Labs	Post construction sample for access road from RA 2 to SA 1N (same location as sample K25701)	PCBs	< 0 33	< 0 33 [2]	None
K25730					Post construction sample for haul road on the west side of SA 1N (same location as sample K25705)	PCBs	< 0 33	< 0 33 [2]	None
K25731					Post construction sample for haul road on the west side of SA 1N (same location as sample K25704)	PCBs	< 0 33	< 0 33 [2]	None
K25732					Post construction sample for access road from RA 4 to SA 1N (same location as sample K25702)	PCBs	< 0 33	< 0 33 [2]	None
K25733					Post construction sample for haul road on the west side of SA 1N (same location as sample K25703)	PCBs	< 0 33	< 0 33 [2]	None
K25734					Post construction sample for access road from RA 2 to SA 1N (same location as sample K25700)	PCBs	< 0 33	< 0 33 [2]	None
K25735	09/17/07	09/18/07	073873	KAR Labs	Staging Area 1N post-construction sample (same location as sample K25706)	PCBs	< 0 33	< 0 33 [2]	None
K25736	09/17/07	09/27/07	073874	KAR Labs	Circular Consumers Energy property located near the Plainwell Dam	PCBs	< 0 33	-	None - background sample
K25737						PCBs	< 0 33	-	None - background sample
K25738						PCBs	< 0 33	-	None - background sample

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Table B — Summary of Samples Collected and Data Received in September 2007

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	PCB Action Limit (mg/kg)	Response Action
Sediment Confirmation Samples									
K55302	09/04/07	09/06/07	073682	KAR Labs	RA 5, Grid 2	PCBs	< 0 33	5	None
K55303	09/06/07	09/07/07	073727	KAR Labs	RA 3B, Grid 1A	PCBs	< 0 33	5	None
[K55306]							[< 0 33]	5	None
K55304					RA 3B, Grid 2A	PCBs	< 0 33	5	None
K55305[1]					RA 3B, Grid 3B	PCBs	2 6	5	additional 6" of material excavated on 09/07/07
[K55305] *APS-090607-06-SD/K55305*			0709078	TriMatrix Laboratories		PCBs	7 8	5	
K55307	09/13/07	09/14/07	073844	KAR Labs	RA 3B, Grid 1B and 2B	PCBs	0 450	5	None
K55308					RA 3B, Grid 3A	PCBs	< 0 33	5	None
K55309	09/20/07	09/21/07	073931	KAR Labs	RA 6B, Grid 1	PCBs	< 0 33	5	None
K55310					RA 6B, Grid 2	PCBs	< 0 33	5	None
K55311 [1]					RA 6B, Grid 3	PCBs	< 0 33	5	None
[K55311] *APS-092007-07-SD/K55311*			0709393	TriMatrix Laboratories		PCBs	0 046	5	None
K55312			073931	KAR Labs	RA 6B, Grid 4	PCBs	0 38	5	None
K55313	09/27/07	09/28/07	074021	KAR Labs	RA 6B, Grid 5	PCBs	3 1	5	None
K55314 [1]					RA 6B, Grid 6	PCBs	< 0 33	5	None
[K55314] *APS-092707-08-SD/K55314*			0709543	TriMatrix Laboratories		PCBs	0 27	5	None
K55315			074021	KAR Labs	RA 6B, Grid 7	PCBs	< 0 33	5	None
K55316					RA 6B, Grid 8	PCBs	< 0 33	5	None
Surface Water Samples									
K30646	08/30/07	09/07/07	073661	KAR Labs	300' downstream of RA 4B	PCBs	< 0 1 ug/L	-	None
K30647					100' upstream of RA 4B	PCBs	< 0 1 ug/L	-	None
K30648					Rinse Blank	PCBs	< 0 1 ug/L	-	None
K30649	09/06/07	09/20/07	073726	KAR Labs	300' downstream RA 3B	PCBs	< 0 1 ug/L	-	None
K30650					100' upstream RA 3B	PCBs	< 0 1 ug/L	-	None
K30651					Rinse Blank	PCBs	< 0 1 ug/L	-	None
K30652	09/13/07	09/27/07	073850	KAR Labs	300' downstream Island 2	PCBs	< 0 1 ug/L	-	None
K30653					100' upstream Island 2	PCBs	< 0 1 ug/L	-	None
K30654					Rinse Blank	PCBs	< 0 1 ug/L	-	None
K30655	09/20/07	-	-	KAR Labs	300' downstream RA 6B	PCBs	NR	-	None
K30656					100' upstream RA 6B	PCBs	NR	-	None
K30657					Rinse Blank	PCBs	NR	-	None
K30658	09/27/07	-	-	KAR Labs	300' downstream RA 6B	PCBs	NR	-	None
K30659					100' upstream RA 6B	PCBs	NR	-	None
K30660					Rinse Blank	PCBs	NR	-	None

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Table B — Summary of Samples Collected and Data Received in September 2007

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	PCB Action Limit (mg/kg)	Response Action
Waste Water Samples									
W_SA1N_Influ_0009	09/04/07	09/06/07	073681	KAR Labs	Staging Area 1N, Discharge 9, Influent sample	PCBs	< 0 1 ug/L	-	None
W_SA1N_MidA_0009					Staging Area 1N, Discharge 9, Midpoint Sample, Right Side	PCBs	< 0 1 ug/L	-	None
W_SA1N_EffluA_0009					Staging Area 1N, Discharge 9, *Effluent Sample, Right Side*	PCBs, TSS	< 0 1 ug/L	Monthly Average of 2 6 x 10^{-5} ug/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA1N_Influ_0010	09/11/07	09/12/07	073807	KAR Labs	Staging Area 1N, Discharge 10, Influent sample	PCBs	0 2 ug/L	-	None
W_SA1N_MidA_0010					Staging Area 1N, Discharge 10, Midpoint Sample, Right Side	PCBs	< 0 1 ug/L	-	None
W_SA1N_EffluA_0010					Staging Area 1N, Discharge 10, Effluent Sample, Right Side	PCBs, TSS, P	< 0 1 ug/L	Monthly Average of 2 6 x 10^{-5} ug/L	None TSS = <4 mg/L, Action Limit = 45 mg/L P = 0 08 mg/L, No Action Limit
W_SA1N_MidB_0006					Staging Area 1N, Discharge 10, Midpoint Sample, Left Side	PCBs	< 0 1 ug/L	-	None
W_SA1N_EffluB_0006					Staging Area 1N, Discharge 10, Effluent Sample, Left Side	PCBs, TSS, P	< 0 1 ug/L	Monthly Average of 2 6 x 10-5 ug/L	None TSS = <4 mg/L, Action Limit = 45 mg/L P = 0 11 mg/L, No Action Limit
[W_SA1N_Dup_0002]						[PCBs]	[< 0 1 ug/L]		None
W_SA1N_Influ_0011	09/13/07	09/14/07	073845	KAR Labs	Staging Area 1N, Discharge 11, Influent sample	PCBs	0 2 ug/L	-	None
W_SA1N_MidA_0011					Staging Area 1N, Discharge 11, Midpoint Sample, Right Side	PCBs	< 0 1 ug/L	-	None
W_SA1N_EffluA_0011					Staging Area 1N, Discharge 11, Effluent Sample, Right Side	PCBs, TSS	< 0 1 ug/L	Monthly Average of 2 6 x 10^{-5} ug/L	None TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA1N_MidB_0007					Staging Area 1N, Discharge 11, Midpoint Sample, Left Side	PCBs	< 0 1 ug/L	-	None
W_SA1N_EffluB_0007					Staging Area 1N, Discharge 11, Effluent Sample, Left Side	PCBs, TSS	< 0 1 ug/L	Monthly Average of 2 6 x 10^{-5} ug/L	None TSS = <4 mg/L, Action Limit = 45 mg/L

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Table B — Summary of Samples Collected and Data Received in September 2007

Notes
1 - Split sample collected by USEPA
2 - PCB concentration of pre-construction sample
TAL - TestAmerica Laboratories
NR - Analytical results not yet received
RA - Removal Area
TSS - Total Suspended Solids
P - Phosphorus
TPH - Total Petroleum Hydrocarbons
TCL - Target Compound List
VOCs - Volatile Organic Compounds
SVOCs - Semi-Volatile Organic Compounds
RCRA - Resource Conservation and Recovery Act
* Duplicate samples are shown in brackets
* USEPA split samples are shown in bold and in brackets USEPA split sample IDs are shown in bold and italicized font
* Label 'A' denotes non-TSCA material sampled from within a grid and label 'B' denotes TSCA material sampled from within a grid area